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4/28/2011

To whom it may concern,

This letter is to inform the TCEQ that ROUND2 INC. (CN602956096/RN104807771) will discontinue operations located at 6301 E. Stassney Lane, Building 6, suite 400, Austin, Texas 78744-3042 on April 30th, 2011. The EPA ID issued for that location is TXR000068577. ✓

ROUND2 INC. will continue operation at a different location and has submitted Form 8700-12 to obtain an EPA ID for the facility.

Best regards,

A handwritten signature in black ink, appearing to read "Paul Adamson", with a horizontal line extending to the right.

Paul Adamson
VP Corporate Development
(512) 731-5957

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REGISTRATION
& RECORDS

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11-3785
8700-12-U

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Bettie Bell - RCRA Subtitle C Site Identification Form (8700-12) for Round2 Inc

From: Bettie Bell
To: stefan.zuntag@round2.net
Date: 5/3/2011 3:36 PM
Subject: RCRA Subtitle C Site Identification Form (8700-12) for Round2 Inc

Hello Mr. Zuntag, I received the letter requesting to inactive EPA ID number TXR000068577 for the old Round2 Inc. location at 6301 E. Stassney Lane, Austin TX 78744; and a copy of the 8700-12 Form requesting to obtain a new EPA ID number for the new location at 1340 Airport Commerce Drive #3300, Austin TX 78741. ✓

I am sending this to you because you are listed on the form as the contact person for Round2 Inc.; and to let you know that I can accept the request to inactivate the old location EPA ID number; however, for the new location, the 8700-12 Form will need to reflect an original signature. The form will be returned to you by mail to the mailing addressing indicated on the form. Please re-submit the form at your convenience for further processing.

Should you have any questions, please feel free to contact me.

Thank you,

Bettie Bell
Program Specialist
Texas Commission on Environmental Quality
Permitting Support Division
IHW Registration & Reporting Section
PO Box 13087, MC-129
Austin, TX 78711-3087
Bettie.Bell@tceq.texas.gov
Phone: 512-239-4743
Fax 512-239-6410

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SEND COMPLETED

FORM TO:

The Appropriate State or
EPA Regional Office.

United States Environmental Protection Agency

RCRA SUBTITLE C SITE IDENTIFICATION FORM

BT
3/28/05

**1. Reason for
Submittal**
(See instructions
on page 13.)

MARK ALL BOX(ES)
THAT APPLY

Reason for Submittal:

- ☒ To provide Initial Notification of Regulated Waste Activity (to obtain an EPA ID Number for hazardous waste, universal waste, or used oil activities)
- ☐ To provide Subsequent Notification of Regulated Waste Activity (to update site identification information)
- ☐ As a component of a First RCRA Hazardous Waste Part A Permit Application
- ☐ As a component of a Revised RCRA Hazardous Waste Part A Permit Application (Amendment # _____)
- ☐ As a component of the Hazardous Waste Report

**2. Site EPA ID
Number (page 14)**

EPA ID Number TXR10000681577

**3. Site Name
(page 14)**

Name: Round 2 Technologies, Inc.

**4. Site Location
Information
(page 14)**

Street Address: 6301 E. Stassney

City, Town, or Village: Austin

State: TX

County Name: Travis (11)

Zip Code: 78744

**5. Site Land Type
(page 14)**

Site Land Type: ☒ Private ☐ County ☐ District ☐ Federal ☐ Indian ☐ Municipal ☐ State ☐ Other

**6. North American
Industry
Classification
System (NAICS)
Code(s) for the Site
(page 14)**

A. 412131413101

B. 412131913101

C.

D.

**7. Site Mailing
Address
(page 15)**

Street or P. O. Box: 6301 E. Stassney Lane Suite 600

City, Town, or Village: Austin, Tx

State: Texas

Country: U.S.A.

Zip Code: 78744

**8. Site Contact
Person
(page 15)**

First Name: Rebecca

MI: A

Last Name: Harwell

Phone Number: (512) 342-8855 Extension:

Email address: becky@round2tech.com

**9. Operator and
Legal Owner
of the Site
(pages 15 and 16)**

A. Name of Site's Operator:
Round 2 Technologies, Inc.

Date Became Operator (mm/dd/yyyy):
10/24/2005

Operator Type: ☒ Private ☐ County ☐ District ☐ Federal ☐ Indian ☐ Municipal ☐ State ☐ Other

B. Name of Site's Legal Owner:
LIT Industrial Texas Ltd.

Date Became Owner (mm/dd/yyyy):

Owner Type: ☒ Private ☐ County ☐ District ☐ Federal ☐ Indian ☐ Municipal ☐ State ☐ Other

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9. Legal Owner (Continued) Address	Street or P. O. Box: 3141 Hood St. Ste 700	
	City, Town, or Village: Dallas, TX	
	State: TX	
	Country: U.S.A.	Zip Code: 75219

10. Type of Regulated Waste Activity

Mark "Yes" or "No" for all activities; complete any additional boxes as instructed. (See instructions on pages 17 to 20.)

A. Hazardous Waste Activities

Complete all parts for 1 through 6.

Y ☒ N ☐ 1. Generator of Hazardous Waste

If "Yes", choose only one of the following - a, b, or c.

- ☐ a. LQG: Greater than 1,000 kg/mo (2,200 lbs./mo.) of non-acute hazardous waste; or
- ☐ b. SQG: 100 to 1,000 kg/mo (220 - 2,200 lbs./mo.) of non-acute hazardous waste; or
- ☒ c. CESQG: Less than 100 kg/mo (220 lbs./mo.) of non-acute hazardous waste

In addition, indicate other generator activities.

Y ☐ N ☒ d. United States Importer of Hazardous Waste

Y ☐ N ☒ e. Mixed Waste (hazardous and radioactive) Generator

Y ☐ N ☒ 2. Transporter of Hazardous Waste

Y ☐ N ☒ 3. Treater, Storer, or Disposer of Hazardous Waste (at your site) Note:
A hazardous waste permit is required for this activity.

Y ☐ N ☒ 4. Recycler of Hazardous Waste (at your site)

Y ☐ N ☒ 5. Exempt Boiler and/or Industrial Furnace

If "Yes", mark each that applies.

- ☐ a. Small Quantity On-site Burner Exemption
- ☐ b. Smelting, Melting, and Refining Furnace Exemption

Y ☐ N ☒ 6. Underground Injection Control

B. Universal Waste Activities

Y ☐ N ☒ 1. Large Quantity Handler of Universal Waste (accumulate 5,000 kg or more) [refer to your State regulations to determine what is regulated]. Indicate types of universal waste generated and/or accumulated at your site. If "Yes", mark all boxes that apply:

	<u>Generate</u>	<u>Accumulate</u>
a. Batteries	<input type="checkbox"/>	<input type="checkbox"/>
b. Pesticides	<input type="checkbox"/>	<input type="checkbox"/>
c. Thermostats	<input type="checkbox"/>	<input type="checkbox"/>
d. Lamps	<input type="checkbox"/>	<input type="checkbox"/>
e. Other (specify) _____	<input type="checkbox"/>	<input type="checkbox"/>
f. Other (specify) _____	<input type="checkbox"/>	<input type="checkbox"/>
g. Other (specify) _____	<input type="checkbox"/>	<input type="checkbox"/>

Y ☐ N ☒ 2. Destination Facility for Universal Waste

Note: A hazardous waste permit may be required for this activity.

C. Used Oil Activities

Mark all boxes that apply.

Y ☐ N ☒ 1. Used Oil Transporter
If "Yes", mark each that applies.

- ☐ a. Transporter
- ☐ b. Transfer Facility

Y ☐ N ☒ 2. Used Oil Processor and/or Re-refiner
If "Yes", mark each that applies.

- ☐ a. Processor
- ☐ b. Re-refiner

Y ☐ N ☒ 3. Off-Specification Used Oil Burner

Y ☐ N ☒ 4. Used Oil Fuel Marketer

If "Yes", mark each that applies.

- ☐ a. Marketer Who Directs Shipment of Off-Specification Used Oil to Off-Specification Used Oil Burner
- ☐ b. Marketer Who First Claims the Used Oil Meets the Specifications

EPA ID NO:

OMB#: 2050-0028 Expires 1/31/2006

11. Description of Hazardous Wastes (See instructions on page 21.)

A. Waste Codes for Federally Regulated Hazardous Wastes. Please list the waste codes of the Federal hazardous wastes handled at your site. List them in the order they are presented in the regulations (e.g., D001, D003, F007, U112). Use an additional page if more spaces are needed.

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WASTE PERMIT DIVISION

TEXAS COMMISSION ON

ENVIRONMENTAL QUALITY

B. Waste Codes for State-Regulated (i.e., non-Federal) Hazardous Wastes. Please list the waste codes of the State-regulated hazardous wastes handled at your site. List them in the order they are presented in the regulations. Use an additional page if more spaces are needed for waste codes.

12. Comments (See instructions on page 21.)

Round 2 Technologies is engaged in the demanufacture of obsolete electronics in order to reintroduce parts and components into either the direct reuse markets or appropriate recycling markets. Materials typically segregated include copper, aluminium, stainless steel, precious metals, plastics and steel. All demanufacturing activities occur by manual means with no resultant wastes. The only wastes that are generated are typical to standard plant waste consisting of office trash, spent packaging, broken pallets.

13. Certification. I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations. For the RCRA Hazardous Waste Part A Permit Application, all operator(s) and owner(s) must sign (see 40 CFR 270.10 (b) and 270.11). (See instructions on page 21.)

Signature of operator, owner, or an authorized representative	Name and Official Title (type or print)	Date Signed (mm/dd/yyyy)
Rebecca Harwell	Rebecca HARWELL - Director of Compliance	12/21/05

DOC #

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ROUND 2 TECHNOLOGIES INC
6301 E STASSNEY LN SUITE 600
AUSTIN, TX 78744
ATTN: REBECCA HARWELL



**ACKNOWLEDGMENT OF RCRA SUBTITLE C
SITE IDENTIFICATION FORM**

This is to acknowledge that you have filed a RCRA Subtitle C Site Identification Form for the facility located at the address shown in the box below to comply with Section 3010 of the Resource Conservation and Recovery Act (RCRA). Your EPA Identification Number for that facility appears in the box below. The EPA Identification Number must be included on all shipping manifests for transporting hazardous wastes; on all Annual Reports that generators of hazardous waste, and owners and operators of hazardous waste treatment, storage, and disposal facilities must file with EPA; on all applications for a Federal Hazardous Waste Permit; and on other hazardous waste management reports and documents required under Subtitle C of RCRA. A Subsequent RCRA Subtitle C Site Identification Form is required should any information on the original document change.

EPA I.D. Number: **TXR000068577**

Facility Name and Address: **ROUND 2 TECHNOLOGIES INC
6301 E STASSNEY LN SUITE 600
AUSTIN, TX 78744**

May 3, 2006